

Liani J. Reeves, OSB No. 013904

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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

A.R., a minor, by and through his guardian
ad litem **ANGELA CANTON**,

Plaintiff,

v.

PORTLAND SCHOOL DISTRICT No. 1J, an Oregon public corporate entity by and
through the Board of Directors of
Multnomah County School District No. 1J,

Defendant.

Case No. 3:23-cv-00375-AN

**DECLARATION OF LIANI J.
REEVES IN SUPPORT OF
DEFENDANT PORTLAND
SCHOOL DISTRICT No. 1J's
SECOND UNOPPOSED MOTION
FOR EXTENSION OF TIME**

I, Liani J. Reeves, declare and state as follows:

1. I am one of the attorneys for Defendant Portland School District No. 1J, also known as Portland Public Schools ("PPS" or "Defendant"). My statements are based on personal knowledge.

2. I have conferred with plaintiff's counsel Kevin Bragg ("Mr. Bragg") and he does not oppose this motion.

3. On February 16, 2023, Plaintiff filed a civil action captioned A.R. v. Portland Public District No. 1J (Case No. 23CV07344) in the Circuit Court of the State of Oregon for the County of Multnomah.

4. On March 15, 2023, Defendant removed the action to federal court. A responsive pleading is currently due in the matter on April 21, 2023.

5. The reason for this motion for extension of time is that Mr. Bragg has informed us that Plaintiff plans to file an amended complaint. For efficiency purposes, Defendant PPS requests an extension so that it can wait to file a responsive pleading in response to the amended complaint.

6. This is Defendant's second motion to extend the deadline for filing a responsive pleading in this Court, and it is not made for the purposes of undue delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: April 21, 2023.

BULLARD LAW

By s/ Liani J. Reeves

Liani J. Reeves, OSB No. 013904
lreeves@bullardlaw.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2023 I served the foregoing

DECLARATION OF LIANI J. REEVES IN SUPPORT OF DEFENDANT

PORTLAND SCHOOL DISTRICT No 1J's SECOND UNOPPOSED MOTION

FOR EXTENSION OF TIME on:

Kevin Brague
The Brague Law Firm
4504 S Corbett Avenue, Suite 250
Portland, OR 97239
kevin@braguelawfirm.com

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by causing a true and correct copy to be **hand-delivered** to the last known address of each person listed. It was contained in a sealed envelope and addressed as stated above.
- ☐ by causing a true and correct copy to be delivered **via overnight courier** to the last known address of each person listed. It was contained in a sealed envelope, with courier fees paid, and addressed as stated above.
- ☐ by **faxing** a true and correct copy to the last known facsimile number of each person listed, with confirmation of delivery. It was addressed as stated above.
- ☐ by **emailing** a true and correct copy to the last known email address of each person listed, with confirmation of delivery.

s/ Liani J. Reeves

Liani J. Reeves, OSB No. 013904
Attorneys for Defendant